

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

SEGONE, INC.,

Plaintiff,

v.

FOX BROADCASTING COMPANY,

Defendant.

)
)
)
)
)
)
)
)
)
)
)

Civil Action No. 3:07cv342-JRS

DECLARATION OF PAUL B. GAFFNEY

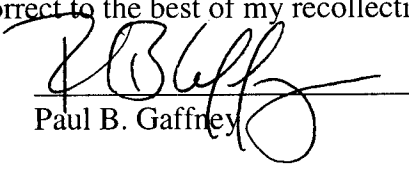
I, Paul B. Gaffney, declare and state as follows:

1. I am a partner at the law firm of Williams & Connolly LLP. I have been admitted *pro hac vice* in this matter to represent Fox Broadcasting Company. I have personal knowledge of the facts set forth in this declaration.

2. I was lead counsel for the plaintiffs in *ABC, et al. v. Flying J Inc.*, filed in April 2006 in the Southern District in New York. Shortly after the filing of that lawsuit, I spoke with Barre Burgon, in-house counsel for Flying J. He informed me that segOne had indemnified Flying J from the claims asserted in that matter, and that pursuant to that indemnity had selected Christopher Sprigman as counsel for Flying J.

3. After Judge Batts enter a ruling in February 2007 denying Flying J's motion to dismiss plaintiffs' copyright claims, I negotiated a settlement with lawyers at the Salt Lake City firm Ray, Quinney & Nebeker, Flying J's regular outside counsel. The settlement included the payment of money. Flying J's counsel informed me that the settlement funds were provided by segOne's insurance company.

I declare this 27th day of July, 2007, under penalty of perjury under the laws of the United States, that the foregoing is true and correct to the best of my recollection.


Paul B. Gaffney